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New Omega Potentially Responsible Parties

Re: An Alternative to OPOG

Dear New Omega PRPs:

Please allow this to introduce you to the Omega Small Volume Organized Group (OSVOG). OSVOG consists of eighteen small-volume Omega PRPs (all under 50 tons) that chose not to enter into a "voluntary" internal cash-out settlement with certain members of the Omega PRP Organized Group ("OPOG"). The members of OSVOG were then involuntarily expelled from OPOG when they objected to OPOG's treatment of non-settling small-volume parties. Although OSVOG's members are all small volume contributors to the Omega site, they range from small local businesses to large national companies. This firm is acting as common counsel for the members of OSVOG, many of whom have their own counsel as well.

Because OSVOG members were all once members of OPOG, we believe there are certain questions you should ask OPOG before you decide whether to join that group. These include:

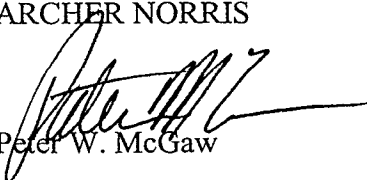
- Does OPOG's current internal allocation scheme treat under-50-ton members the same as over-50-ton members? Does the current internal allocation scheme treat under-50-ton members on a purely volumetric basis? If not, how much more than their volumetric share will an under-50-ton member pay? How much more than their combined volumetric share, as a group, will the new under-50-ton PRPs pay?
- How does the current allocation scheme assess the volume of under-50-ton members who have had their volume indemnified as a result of an internal cash-out settlement? Are these indemnified volumes assessed on the same basis as the assessment of the volumes of "pay-as-you-go" under-50-ton members?
- Who gets the benefit of funds, including settlement premiums, raised by an OPOG internal cash-out settlement? Do all members of OPOG share in the financial benefits (and risks), or just some small segment of OPOG? Will you be given the opportunity to share in the benefits of an internal cash-out if you agree to assume responsibility for your proportionate share of the settling parties' volume?

- If you are considering accepting one of OPOG's settlement options, what is the actual cost of the work performed so far? What percentage of the work still needs to be performed? What is the estimate for performing the work that remains? How do these figures compare to any estimate for the total work upon which the settlement offer is based?

The answers you receive to these questions should help you make an informed decision about joining OPOG. Please feel free to contact me should you like additional information about OSVOG.

Very truly yours,

ARCHER NORRIS



Peter W. McGaw

PWM:sea